

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:** § **CASE NO. 25-30155**  
ALLIANCE FARM AND RANCH, LLC §  
*Debtor.* § **CHAPTER 11**

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**NOTICE OF APPEARANCE, REQUEST FOR SERVICE OF NOTICES,  
AND DEMAND FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that in addition to Reagan H. "Tres" Gibbs, Samuel T. Pendergast hereby appears as counsel for Erik Ostrander and Darla Ostrander (the "Ostranders"), the Co-Debtors in this case, who hereby submits this notice of appearance in the above-captioned proceeding, requests notice of all hearings and conferences herein, and makes demand for service of all papers herein, including, but not limited to, papers and notices pursuant to Bankruptcy Rules 1009, 2002, 3017, 9007 and 9010 and § 342 (if applicable) of the Bankruptcy Code. All notices given or required to be given in this case shall be given to and served upon Samuel T. Pendergast as follows:

Samuel T. Pendergast  
COKINOS | YOUNG  
Four Houston Center  
1221 Lamar Street, 16<sup>th</sup> Floor  
Houston, Texas 77010  
[spendergast@cokinoslaw.com](mailto:spendergast@cokinoslaw.com)

**PLEASE TAKE FURTHER NOTICE** that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and sections of the Bankruptcy Code specified above, but also includes, without limitation, the schedules, statement of financial affairs, operating reports, any plan of reorganization or disclosure statement, any letter, application, motion, complaint, objection, claim, demand, hearing, petition, pleadings or request, whether

formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise, whether or not filed with or delivered to the Bankruptcy Clerk, Court or Judge (as those terms are defined in Bankruptcy Rule 9001) in connection with and with regard to the above-referenced bankruptcy case and any proceedings related thereto.

**PLEASE TAKE FURTHER NOTICE** the Ostranders intend that neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive (i) the rights of the Ostranders to have final orders in non-core matters entered only after *de novo* review by a District Judge; (ii) the rights of the Ostranders to trial by jury in any proceedings so triable in these cases or any case, controversy or proceeding related to these cases; (iii) the rights of the Ostranders to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Ostranders are or may be entitled under agreements, at law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoff, and recoupments the undersigned expressly reserves on behalf of the Ostranders.

Respectfully submitted,

**COKINOS | YOUNG**

By: /s/ Samuel T. Pendergast

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*Counsel for Erik Ostrander and Darla  
Ostrander*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 31, 2025, a true and correct copy of the foregoing document was served by the Electronic Case Filing system for the United States Bankruptcy Code for the Southern District of Texas.

/s/ Samuel T. Pendergast

Samuel T. Pendergast